

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	
KrisJenn Ranch, LLC,	§	CHAPTER 11
	§	
<i>Debtor</i>	§	CASE No. 20-50805

KrisJenn Ranch, LLC, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	ADVERSARY No. 20-05027
DMA Properties, Inc.; and Longbranch	§	
Energy, LP, et al.,	§	
	§	
<i>Defendants.</i>	§	

DMA Properties, Inc. and Longbranch	§	
Energy, LP, et al.	§	
	§	
<i>Counterplaintiffs,</i>	§	
	§	
v.	§	
	§	ADVERSARY No. 20-05027
KrisJenn Ranch, LLC; Larry Wright, et	§	
al.,	§	
	§	
<i>Counterdefendants.</i>	§	

**DMA AND LONGBRANCH’S UNOPPOSED MOTION
FOR TWO-WEEK EXTENSION OF BRIEFING DEADLINES**

DMA Properties, Inc. and Frank Daniel Moore (collectively, “DMA”) and Longbranch Energy, LP (“Longbranch”) respectfully request a two-week extension of their deadline to submit a motion for attorneys’ fees. On March 26, 2024, this Court

entered a final judgment awarding reasonable and necessary attorneys' fees to DMA and Longbranch under the Texas Declaratory Judgment Act. Final Judgment [#329]. Under Federal Bankruptcy Rule of Procedure 7054, DMA and Longbranch's motion for attorneys' fees is currently due on April 9, 2024.

DMA and Longbranch now respectfully move to extend that deadline by two weeks to April 23, 2024. This extension is sought for several reasons. First, DMA and Longbranch are currently in the process of retrieving and collecting billing records from their prior firm (Cleveland Terrazas PLLC), which has impacted their ability to timely file a request for attorneys' fees by the current deadline. Second, DMA and Longbranch's counsel have had existing obligations that have impeded DMA and Longbranch's counsel to complete the motion for attorneys' fees by the existing deadline, including a full-day hearing on March 22 and a full-day mediation in another matter on March 28 and intensive summary-judgment briefing for yet another matter that is due in early April (as well as other briefing deadlines and an important hearing in another matter on April 10). This weekend is also Easter, and next weekend DMA's counsel will be out of town in connection with solar eclipse. While DMA and Longbranch intend to make whatever progress they can in drafting the motion for attorneys' fees as expediently as possible under the circumstances, DMA and Longbranch expect that it will take substantial time to review (and appropriately redact) invoices submitted in connection with the motion for attorneys' fees and to draft the motion and supporting declarations from counsel.

Given these circumstances, DMA and Longbranch respectfully request a two-week extension of their deadline to file a motion for attorneys' fees from April 9, 2024 to April 23, 2024. DMA and Longbranch further request that KrisJenn and Wright's briefing in response shall be due two weeks after DMA and Longbranch file their motion for attorney's fees.

The parties have conferred regarding this motion, and KrisJenn and Wright have indicated they do not oppose this motion to extend briefing deadlines.

Respectfully submitted,

/s/ Christopher S. Johns

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CERTIFICATE OF CONFERENCE

I hereby certify that I called opposing counsel regarding this requested extension on March 29, 2024 and April 1, 2024. Opposing counsel confirmed on April 1, 2024 that they do not oppose this motion.

/s/ Austin H. Krist

Austin H. Krist

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2024, a true and correct copy of the foregoing document was transmitted to each of the parties via the Court's electronic transmission facilities and/or via electronic mail as noted below. For those parties not registered to receive electronic service, a true and correct copy of the foregoing document was served by United States Mail, first class, postage prepaid, at the address noted below.

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/s/ Christopher S. Johns
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